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August 15, 2002

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**RECEIVED**

AUG 15 2002

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**Re: EX PARTE**

***In the Matter of Qwest Communications International, Inc.  
Consolidated Application for Authority to Provide In-Region,  
InterLATA Services in Colorado, Idaho, Iowa, Nebraska, and North  
Dakota, WC Docket No. 02-148***

***In the Matter of Qwest Communications International, Inc.  
Consolidated Application for Authority to Provide In-Region,  
InterLATA Services in Montana, Utah, Washington, and Wyoming,  
WC Docket No. 02-189***

Dear Ms. Dortch:

On August 14, 2002, Donna Sorgi and Sherry Lichtenberg of WorldCom, and Marc Goldman of Jenner & Block, met with Chairman Powell and his legal advisor Christopher Libertelli regarding the above-referenced proceedings. Consistent with our pleadings in these proceedings, we explained that Qwest should fix key problems in its Operation Support Systems (OSS) before gaining section 271 authority. In particular, we explained that Qwest, unlike any other BOC that has received section 271 authority, does not provide migration by name and telephone number and industry-standard migrate-as-specified – two functions critical to WorldCom's in processing service orders. We also explained that Qwest must provide WorldCom with customized routing in the form we have requested, consistent with Commission precedent and the section 271 checklist. With regard to line sharing, we expressed our agreement with Covad that the high-frequency portion of the loop should be priced at \$0. Finally, we agreed with AT&T and others that Qwest's agreements with CLECs that were not filed with state commissions and in which Qwest afforded CLECs special treatment in exchange for remaining silent in section 271 proceedings, were, and continue to be, discriminatory and violate sections 251, 252, and 271 of the Telecommunications Act. In addition, we stated that these secret deals call into question the integrity of the OSS test, which relied on data from CLECs that were parties to the secret agreements.

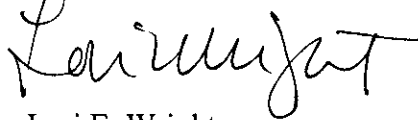
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The attached handouts, showing the availability of WorldCom's Neighborhood product, were distributed at the meeting.

Please call me with any questions about this matter.

Sincerely,

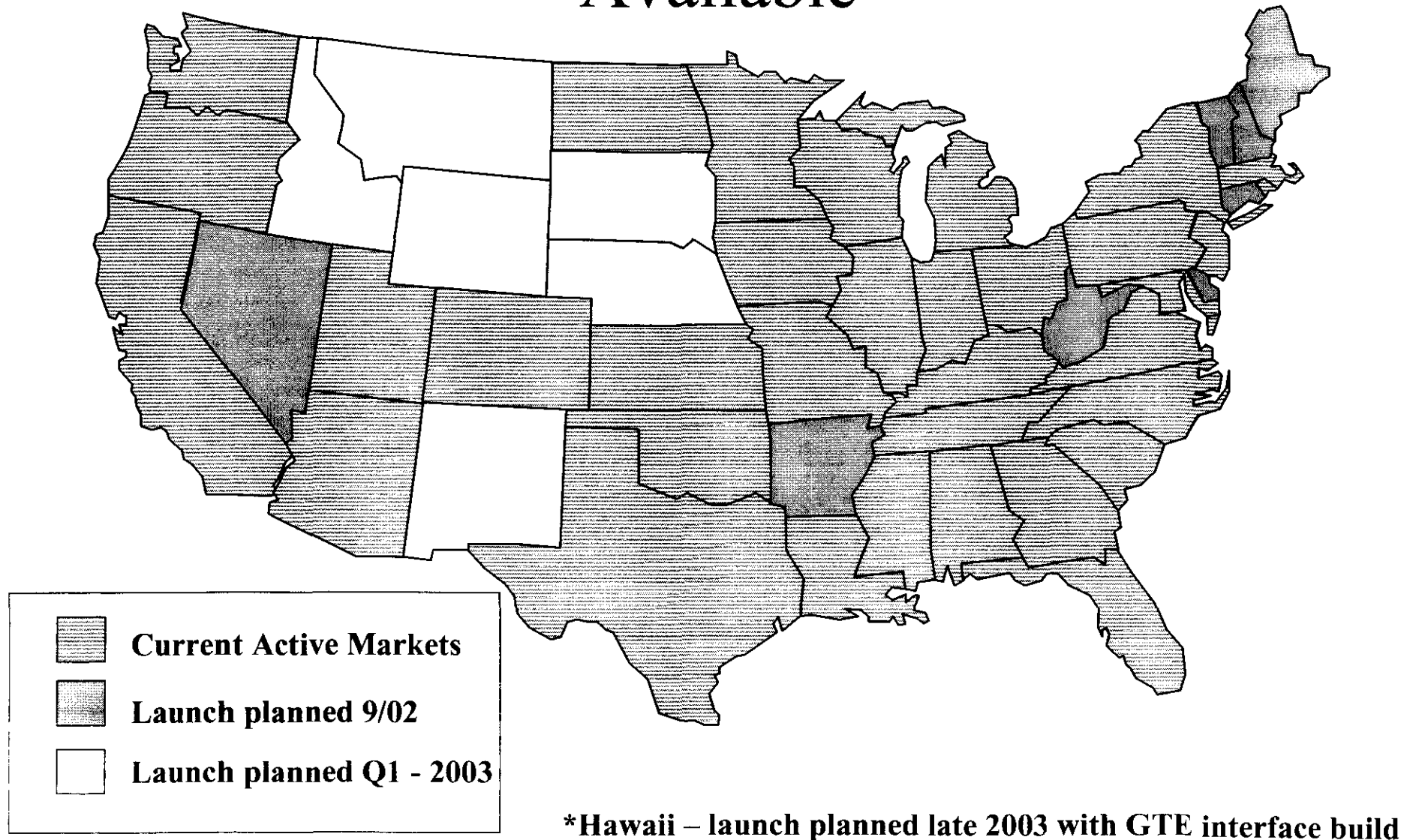
A handwritten signature in black ink, appearing to read "Lori Wright", written in a cursive style.

Lori E. Wright  
Associate Counsel  
Federal Advocacy

cc: Chairman Powell, C. Libertelli, E. Yockus (electronically), M. Carowitz (electronically), G. Remondino (electronically), M. Cohen (electronically), R. Harsch (electronically), ND PSC (electronically), J. Jewel (electronically), P. Baker (electronically), C. Post (electronically), B. Smith (electronically), Y. Dori (electronically), J. Myles (electronically), S. Vick (electronically), J. Orchard (electronically), WUTC (electronically), S. Oxley (electronically)

Enclosures

# States in Which MCI's Neighborhood is Available



# MCI's Neighborhood in Qwest Territory

NEIGHBORHOOD Product Suite				Zone
Complete *		Choice	Standard	Availability
<b><u>States With Pending 271 Applications</u></b>				
Colorado	\$59.99	\$31.99	NA	Zones 1 - 2 (81%)
Idaho	NA			
Iowa	\$57.99	NA	NA	Zone 1 (28%)
Montana	NA			
Nebraska	NA			
North Dakota	\$57.99	NA	NA	Zone 1 (92%)
Utah	\$59.99	NA	NA	Zone 1 (57%)
Washington	\$55.99	\$31.99	NA	Zones 1 - 4 (60%)
Wyoming	NA			

- Neighborhood Complete: Unlimited local and long distance calling, plus five features
- Neighborhood Choice: Unlimited local and 7¢ long distance rate, with unlimited long distance calls to other MCI local customers at no additional charge, plus four features
- Neighborhood Standard: Unlimited local and 12¢ long distance rate, with unlimited long distance calls to other MCI local customers at no additional charge